

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

COMPLEX MEMORY, LLC,

Plaintiff

-against-

TEXAS INSTRUMENTS, INC. and  
SVTRONICS, INC.,

Defendants

Civil Action No.: 2:17-cv-699-JRG

**NOTICE OF DESIGNATION OF MEDIATOR**

Plaintiff/Counter-defendant Complex Memory, LLC (“Complex Memory”) hereby notifies the Court that all parties have agreed to designate a mediator in the above-entitled case:

Honorable David Folsom (Retired)  
Jackson Walker L.L.P.  
6002 Summerfield Drive, Suite B  
Texarkana, Texas 75503  
Telephone: (903) 255-3251  
Facsimile: (903) 255-3266  
Email: [dfolsom@jw.com](mailto:dfolsom@jw.com)

Dated: January 12, 2018

Respectfully submitted,

/s/ Dmitry Kheyfits

Dmitry Kheyfits — Lead Counsel  
New York State Bar No. 4743795

[dkheyfits@kheyfits.com](mailto:dkheyfits@kheyfits.com)

Andrey Belenky

New York State Bar No. 4524898

[abelenky@kheyfits.com](mailto:abelenky@kheyfits.com)

Hanna G. Cohen

[hgcohen@kheyfits.com](mailto:hgcohen@kheyfits.com)

New York State Bar No. 4471421

KHEYFITS P.C.  
1140 Avenue of the Americas  
9th Floor  
New York, New York 10036  
Tel. (212) 203-5399  
Fax. (212) 203-6445

Jeffrey G. Toler  
(*Pro Hac Vice* motion to be filed)  
[jtoler@tlgiplaw.com](mailto:jtoler@tlgiplaw.com)  
Craig S. Jepson, SBN 24061364  
[cjepson@tlgiplaw.com](mailto:cjepson@tlgiplaw.com)  
TOLER LAW GROUP, PC  
8500 Bluffstone Cove  
Suite A201  
Austin, TX 78759  
(512) 327-5515

/s/ L. Charles van Cleef  
L. Charles van Cleef TX SB #00786305  
Van Cleef Law Office  
PO Box 2432  
Longview, TX 75606-2432  
Telephone: (903) 248-8244  
Facsimile: (903) 248-8249  
[charles@vancleef.pro](mailto:charles@vancleef.pro)

*Attorneys for Plaintiff Complex Memory, LLC*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served on counsel for all parties via CM/ECF electronic filing, in accordance with the Court's Local Rules, on this Friday, January 12, 2018.

/s/ L. Charles van Cleef  
L. Charles van Cleef